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PROPOSED ATTORNEYS FOR DEBTORS-IN-
POSSESSION

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF WYOMING**

In re: BOTW HOLDINGS, LLC Debtor	Case No. 24-20138 Chapter 11 (Subchapter V)
In re: HUSKEMAW OPTICS, LLC Debtor	Case No. 24-20141 Chapter 11 (Subchapter V)
In re: BEST OF THE WEST PRODUCTIONS, LLC Debtor	Case No. 24-20142 Chapter 11 (Subchapter V) Jointly Administered Under Case No. 24-20138

**MOTION FOR EXTENSION OF DEADLINE TO FILE SCHEDULES OF
ASSETS AND LIABILITIES AND STATEMENTS OF FINANCIAL AFFAIRS**

Debtors BOTW Holdings, LLC (“BOTW”), Huskemaw Optics, LLC
 (“Huskemaw”), and Best of the West Productions, LLC (“Productions”) (collectively, the

“Debtors”), debtors and debtors-in-possession in the above-captioned chapter 11 cases, by and through undersigned proposed counsel, hereby move the Court for entry of an order extending the deadline set forth in the Court’s Deficiency Notice for the Debtors to file schedules of assets and liabilities and statements of financial affairs (the “Schedules and Statements”) by fourteen (14) days from the date of entry of an order resolving the Debtors’ pending application to employ BMC Group, Inc. (“BMC”) (the “Motion”). In support of this Motion, Debtors state as follows:¹

JURISDICTION AND VENUE

1. The Court has jurisdiction to consider this Motion pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding under 28 U.S.C. § 157(b)(2). Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

2. The predicates for the relief requested herein are § 1116(3), Fed. R. Bankr. P. 1007 and 9006, and L.B.R. 1007-1.

BACKGROUND

3. On April 19, 2024, BOTW filed a voluntary petition for relief under chapter 11, subchapter V, of the Bankruptcy Code in the United States Bankruptcy Court for the District of Wyoming (the “Court”), commencing Bankruptcy Case No. 24-20138.

4. On April 21, 2024, Huskemaw filed a voluntary petition for relief under chapter 11, subchapter V, of the Bankruptcy Code in this Court, commencing Bankruptcy Case No. 24-20141.

¹ Unless otherwise specified, all references herein to “Section,” “§,” “Bankruptcy Code” and “Code” refer to the U.S. Bankruptcy Code, 11 U.S.C. § 101, *et seq.*

5. On April 22, 2024, Productions filed a voluntary petition for relief under chapter 11, subchapter V, of the Bankruptcy Code in this Court, commencing Bankruptcy Case No. 24-20142.

6. On April 24, 2024, the Court entered its *Order Directing Joint Administration of Related Chapter 11 Cases for Procedural Purposes Only and Entry of Related Relief* [Doc. 13, Case No. 24-20138] (the “Joint Administration Order”) pursuant to which the Debtors’ chapter 11 cases are jointly administered for procedural purposes only under BOTW Holdings, LLC, case no. 24-20138.

7. The Debtors are authorized to operate their business as debtors-in-possession under §§ 1107(a) and 1108.

8. On April 22, 2024, the Court entered its Deficiency Notice [Case No. 24-20142, Doc. 6; Case No. 24-20141, Doc. 7; Case No. 24-20138, Doc. 8], whereby the Court directed the Debtors to file certain necessary documents by the deadlines set forth therein. Pertinent to this Motion, the Court therein directed the Debtors to file their Schedules and Statements on or before May 6, 2024 (the “Schedules and Statements Deadline”).

9. On April 26, 2024, the Debtors filed their *Ex Parte Application for Entry of an Order Approving Employment of BMC Group, Inc.* [Doc. 24] (the “BMC Retention Application”), whereby Debtors seek to employ BMC to assist the Debtors in the preparation and filing of the Schedules and Statements.

10. As set forth in the BMC Retention Application, it would be costly and cumbersome for the Debtors to prepare the Schedules and Statements without the assistance of BMC in that Debtors’ financial affairs are complex and their internal staffing

is limited.

11. As of the date of this filing, the BMC Retention Application remains pending.

12. Accordingly, Debtors have filed the immediate Motion seeking an extension of the Schedules and Statements Deadline through and including the date the Court enters an order resolving the BMC Retention Application plus fourteen (14) days (the “Extension”) to preserve estate resources toward their most economical usage.

13. For the avoidance of doubt, Debtors do not herein seek an extension for any of the other deadlines set forth in the Deficiency Notice aside from the Schedules and Statements Deadline.

14. Debtors submit that cause exists for purposes of Fed. R. Bankr. P. 9006(b)(1) for the Court to grant the Extension. Furthermore, to the extent the Extension protracts the deadline for the filing of the Schedules and Statements past the date set for the meeting of the creditors – May 21, 2024 [Case No. 24-20142, Doc. 11; Case No. 24-20141, Doc. 11; Case No. 24-20138, Doc. 12] – Debtors submit that there exist “exceptional circumstances” pursuant to L.B.R. 1007-1(B) to excuse the same. Similarly, should the Extension exceed the date which is more than thirty (30) days after the date of the order for relief, Debtors submit that there exist extraordinary and compelling circumstances under § 1116(3) to grant the Extension.

15. The relief requested in this Motion is not prohibited by Fed. R. Bankr. P. 9006(b)(2).

16. Debtors do not seek the Extension to hinder, delay, or vex the expeditious

progression of these proceedings. Rather, Debtors have been informed by BMC Group, Inc. (“BMC”) that BMC believes that it will need 14 days to complete the Schedules and Statements. However, BMC does not want to commence work on the Schedules and Statements until such time as the Court approves its retention. To the extent that BMC’s retention is approved expeditiously, it is very likely that the Schedules and Statements will be completed, at last in part, prior to the date set for the 341 meeting of creditors.

NOTICE

17. A copy of this Motion and proposed order will be served electronically via the Court’s CM/ECF system upon the Office of the United States Trustee, Joli A. Lofstedt Subchapter V trustee, and those appearing and requesting notice. The Debtors submit that, considering the nature of the relief requested, no other or further notice need be given.

WHEREFORE, the Debtors respectfully request the Court enter an order, substantially in the form of proposed order attached hereto, extending the deadline for the Debtors to file their Schedules and Statements by fourteen (14) days from the date of entry of an order resolving the Debtors’ pending application to employ BMC, and granting any such other and further relief as the Court deems just and proper.

Dated: May 3, 2024

Respectfully submitted,

MARKUS WILLIAMS YOUNG &
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*Proposed Counsel for the Debtors and
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CERTIFICATE OF SERVICE

I hereby certify that on May 3, 2024, I caused a true and correct copy of the foregoing **MOTION FOR EXTENSION OF DEADLINE TO FILE SCHEDULES OF ASSETS AND LIABILITIES AND STATEMENT OF FINANCIAL AFFAIRS** to be served, electronically, upon the parties indicated below via the Court's CM/ECF system:

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